

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JHONY SANTIAGO CABRERA, Individually
and on behalf of others similarly situated,

Plaintiffs,

-against-

211 GARAGE CORP., 301 PARK CORP.,
221 THOMPSON STREET PARK CORP.,
PARK IT MANAGEMENT CORP.,
UNKNOWN CORPORATIONS "A-Z"
FRED "FREDDY" WHITE, and
ROY BERNARD,

Defendants.

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05 Civ. 2272 (GBD)

DECLARATION

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Francisco Rodas, Individually
and on behalf of others similarly situated,

Plaintiff,

-against-

PARK IT MANAGEMENT CORP.,
211 GARAGE CORP., 301 PARK CORP.,
221 THOMPSON STREET PARK CORP.,
UNKNOWN CORPORATIONS "A-Z"
FRED "FREDDY" SPINDLER aka
FRED "FREDDY" WHITE, ROY SHOMBER
aka ROY BERNARD, and MITCHELL GERBER,

Defendants.

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07 Civ. 7313 (GBD)

I, Anjuli Shukla, declare under penalty of perjury:

1. I am a legal assistant with the law firm of Michael Shen & Associates, P.C., attorneys for Plaintiffs in the above-referenced matter, and as such am aware of the facts of this case.

2. I determined that the size of the potential class totals approximately 345 current and/or former employees at Park It Management Corp., who worked as garage attendants from the time period of February 1999 through March 2006.

3. This number was based on documents produced by Defendants and interviews with Plaintiffs Francisco Rodas and Jhonny Cabrera, who were employed at Park It Management Corp. from August 1996 to June 2007 and April 1995 to February 2002, respectively.

4. According to wage reporting lists at Park It Management Corp., which were produced by Defendants, there were 112 garage attendants employed in 2003 and 120 garage attendants employed in 2005.

5. According to Plaintiffs' Francisco Rodas and Jhonny Cabrera there were about 80 to 120 garage attendants working for all garages at any given time. (Cabrera Decl. 4; Rodas Decl. 4)

6. Using the range of the number of garage attendants provided by plaintiffs and the number of garage attendants on the wage reporting lists provided by defendants, I estimated that at any given time there were about 100 garage attendants working for Park It.

7. I compared the names on the list from January 2003 to those on the list from January 2005. Out of the 120 garage attendants employed in January 2005, there were 56 new employees. Since the only data provided covers 2003-2005, I extrapolated from the data and estimated there were about 50-60 new employees every two years.


8. By applying the estimated number of new employees to the 8.75 year period, I estimated that from February 1999 to present, about 345 current and/or former employees worked

as garage attendants for Park It Management Corp. I computed this estimate by multiplying the estimated number of new garage attendants every two years (56) by the number of two year periods from February 1999 to present. During the 8.75 year period, there were about 245 new garage attendants (56×4.375). I then added the number of new attendants to the estimated base number of attendants at any given time (100), which totals 345 garage attendants.

9. I understand that my computation of the number of garage attendants employed is a gross estimate of the total number of attendants. The estimate correlates with the limited data provided by defendants.

I, Anjuli Shukla, declare under penalty of perjury that the foregoing is true and correct:

Executed on: New York, New York
November 5, 2007



Anjuli Shukla